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October 13, 2016

BY E-MAIL and ECF

Daniel Post Filor
United States Attorney's Office, SDNY
86 Chambers Street
New York, NY 10007

Pierre G. Armand
United States Attorney's Office, SDNY
One Saint Andrew's Plaza
New York, NY 10007

Re: United States v. Kathy Scott, et al.
16-CR-626 (KMK)

Dear AUSA Filor and AUSA Armand:

Pursuant to Federal Rules of Criminal Procedure Rule 16(a), *Brady v. Maryland*, 373 U.S. 83 (1963), *Giglio v. United States*, 405 U.S. 150 (1972), and their progeny, please provide the following discovery at your earliest convenience:

- All records of inmate Kevin Moore from Rikers Island including:
 - Videos of inmate Moore's arrival at Rikers Island
 - Videos of inmate Moore while at Rikers Island
 - The tape recording and/or video of the interview with Rikers IG and inmate Moore
 - Rikers IG notes
- Any and all notes, 302 reports, and/or memoranda created during the investigation of this case;
- Transcripts of the grand jury proceedings in the above-captioned case;

- Proffer agreements, plea agreements, and plea allocutions (if any) for cooperating witnesses Cosman and Lowery; and
- Any and all recordings of interviews conducted during the investigation of this case.

Please consider this request to be ongoing under Fed.R.Crim.P. 16(c). If any of the requested materials cannot be produced at this time pursuant to the policies of the United States Attorney's Office, please preserve all of the requested documents for production pursuant to the Jencks Act, 18 U.S.C. § 3500, et seq., as appropriate.

Sincerely,

/s/
Martin Geduldig, Esq.
Attorney for Kathy Scott

Cc: Hon. Kenneth M. Karas (by ECF)
All parties (by ECF)
Kathy Scott (by email)